

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM,	:	CIVIL ACTION NO.: 19-5697
<i>Plaintiff</i>	:	Hon. Juan R. Sánchez
v.	:	
LISA REYNOLDS-BARBOUNIS,	:	
<i>Defendant</i>	:	JURY TRIAL DEMANDED

**ORDER**

**AND NOW**, this                      day of                      , 2021, upon consideration of Plaintiff's Motion to File Under Seal and any response thereto, it is hereby **ORDERED and DECREED** that Plaintiff's Motion to Seal is **GRANTED**.

It is further **ORDERED** that Plaintiff's Partial Motion for Summary Judgment, and Accompanying Exhibits, Defendant's Motion for Summary Judgment, and Accompanying Exhibits, and any responses or replies thereto are filed under seal.

BY THE COURT:

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**Honorable Juan R. Sanchez**

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THE MIDDLE EAST FORUM,	:	CIVIL ACTION NO.: 19-5697
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<i>Defendant</i>	:	JURY TRIAL DEMANDED

**PLAINTIFF’S MOTION TO SEAL THE PARTIES’ MOTIONS FOR  
SUMMARY JUDGMENT AND EXHIBITS**

Pursuant to Local Rule 5.1.5(a)(2), Plaintiff The Middle East Forum (“Plaintiff” or “MEF”), by counsel, respectfully moves this Court to seal the Plaintiff’s upcoming partial motion for summary judgment and accompanying exhibits, Defendant’s motion for summary judgment and accompanying exhibits and any responses or replies thereto. Consistent with the Court’s prior sealing of sensitive materials in this trade secret misappropriation matter, this request to seal is to protect information, and testimony related to information, that Plaintiff designated as “CONFIDENTIAL” and/or “ATTORNEY’S EYES ONLY” pursuant to the Stipulated Confidentiality Agreement and Protective Order. *See* Stipulated Confidentiality and Protective Order, Dkt. No. 54. For the reasons set forth in MEF’s accompanying Memorandum, this Court should grant MEF’s Motion to Seal. Wherefore, for the reasons set forth more fully in the accompanying Memorandum in Support of Plaintiff’s Motion, MEF, by counsel, respectfully requests this Court to:

1. Enter the proposed order attached hereto; and
2. Order that Plaintiff’s Partial Motion for Summary Judgment and accompanying exhibits, Defendant’s Motion for Summary Judgment and accompanying exhibits, and any responses or replies thereto, be sealed in accordance with Local Rule 5.1.5(b)(2).

Respectfully submitted,

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Dated: October 13, 2021